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April 18, 2025

VIA ECF

The Honorable Timothy J. Savage
United States District Judge, E.D.P.A.
11613 U.S. Courthouse
601 Market Street, Room 9614
Philadelphia, PA 19106

Re: *Tracey Pavlicin v. CapTech Ventures, Inc., et al.*
Docket No. 2:24-cv-05415-TJS

Dear Judge Savage:

As you know, this firm represents Defendant CapTech Ventures, Inc. in the above-referenced matter. We write, without objection from Plaintiff's counsel, to respectfully request that Your Honor extend the deadlines as set forth in the Court's February 4, 2025 Scheduling Order. *See* ECF No. 11. Specifically, Defendant is seeking the fact discovery deadline to be extended until July 14, 2025. As the fact discovery deadline has a rippling effect on the remaining established deadlines, we respectfully request an extension of all deadlines in line with the 45-day extension of the end of fact discovery.

Currently, the fact discovery deadline is May 30, 2025. Defendant has already provided responses to Plaintiff's written discovery requests and, to date, had produced over 300 pages of documents. Despite Defendant's best efforts to continue to conduct discovery expeditiously, a recent ESI search of Defendant's systems yielded a significant number of documents (*i.e.*, 20,000+ documents) that require thorough assessment for purposes of determining relevancy, responsiveness, and privilege, before producing a supplemental production to Plaintiff's counsel. Considering the voluminous number of documents, we have already spoken with Plaintiff's counsel about the potential need to possibly narrow the search terms.

Additionally, the parties are currently engaged in ongoing negotiations regarding the terms of a proposed Stipulated Confidentiality Agreement and Protective Order, which we intend to finalize and file via a Joint Motion for Entry of same. Entry of this Agreement is vital to Defendant's otherwise confidential business interests and the parties intend to utilize it throughout discovery.

We conferred with Plaintiff's counsel via phone yesterday (April 17, 2025) at approximately 4:30 p.m. to discuss Plaintiff's Motion to Compel Discovery, dated April 16, 2025; Defendant's responses to Plaintiff's supplemental discovery requests, Defendant's anticipated ESI production, and the parties' Stipulated Confidentiality Agreement and Protective Order.

Under the circumstances, Defendant would greatly benefit from a 45-day extension of all deadlines, which would allow us to properly address the voluminous ESI results to provide for a thorough exchange of supplemental written discovery and meaningful depositions in this case.

If it is acceptable to the Court, Defendant respectfully requests that Your Honor modify the operative Scheduling Order. This request is made in good faith and is not designed to unnecessarily extend deadlines previously set by the Court. As noted above, Plaintiff does not object to this request.

Thank you for Your Honor's consideration of this request. Should Your Honor have any questions, the parties are available for a telephone conference.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Renee N. Smith

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cc: Lane Schiff, Esq. (via email)
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